

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MATTHEW STEIN and JEROME LHOTE,

23 Civ. 2508 (NRB)

Plaintiffs,

v.

SKATTEFORVALTNINGEN,

Defendant.

SKATTEFORVALTNINGEN,

Counterclaim Plaintiff,

v.

MATTHEW STEIN, JEROME LHOTE, and
LUKE MCGEE,

Counterclaim Defendants.

WITNESS STATEMENT OF LASSE LUND MADSEN

1. In connection with the above-referenced action, I prepared a report and a rebuttal report on matters of Danish law.
2. My initial report, dated September 6, 2024, is attached as Exhibit 300.
3. My rebuttal report, dated October 15, 2024, is attached as Exhibit 301.
4. Source documents referred to in my initial report and my rebuttal report are attached as Exhibit 302.

5. An additional source that bears on my discussion of the case known as Operation Greed set out on pages 9 and 10 of my initial report and that I obtained since completing my rebuttal report is attached as Exhibit 303.
6. Documents cited in my initial report or my rebuttal report that were Bates numbered with the prefix SKAT_MAPLEPOINT are attached as Exhibit 304 and are included in Bates number order. I understand that SKAT provided translations into English of certain of those documents and those translations are included in Exhibit 304. Where there is a Danish original and a translation of it into English, my testimony is based on my review of the original Danish language documents.
7. Documents cited in my initial report or my rebuttal report that were Bates numbered with the prefix STEIN_LHOTE are attached as Exhibit 305 and are included in Bates number order. I understand that Stein and Lhote provided translations into English of certain of those documents and those translations are included in Exhibit 305. Where there is a Danish original and a translation of it into English, my testimony is based on my review of the original Danish language documents.
8. I incorporate in this Witness Statement by reference, and adopt, my initial report and my rebuttal report as my direct testimony to be given before the Court in the trial of this matter.

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 3, 2025, at Aarhus, Denmark.



Lasse Lund Madsen